

REMARKS

The Official Action mailed May 16, 2007, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on December 12, 2003; February 25, 2004; September 21, 2004; May 10, 2005; April 21, 2006 and March 13, 2007. A further Information Disclosure Statement is submitted herewith and consideration of this Information Disclosure Statement is respectfully requested.

Claims 1-13 were pending in the present application prior to the above amendment. Dependent claims 3, 6, 9 and 13 have been canceled without prejudice or disclaimer, independent claims 1, 4, 7 and 10 have been amended to better recite the features of the present invention, and new dependent claims 14-29 have been added to recite additional protection to which the Applicant is entitled. Accordingly, claims 1, 2, 4, 5, 7, 8, 10-12 and 14-29 are now pending in the present application, of which claims 1, 4, 7 and 10 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 2 of the Official Action asserts that claims 3, 6, 9 and 13 fail to further limit the subject matter of a previous claim. In response, the Applicant has canceled claims 3, 6, 9 and 13 without prejudice or disclaimer.

Paragraph 5 of the Official Action rejects claims 1-13 as obvious based on the combination of U.S. Patent No. 6,019,284 to Freeman and the disclosure at page 2, line 21, of the present specification, which the Official Action refers to as "Applicant's Admitted Prior Art (AAPA)." The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 1, 4, 7 and 10 have been amended to recite a display device equipped on one side of a substrate, and a thin film integrated circuit equipped on the other side of the substrate, where the display device is electrically connected to the thin film integrated circuit through a contact hole in the substrate, which is supported in the present specification, for example, by Figures 1C and 2C, and their associated descriptions in the present specification. The Applicant respectfully submits that this amendment clarifies the positional relationship between the display device and the thin film integrated circuit.

Although Freeman may disclose a flexible chip card with a display, Freeman, either alone or in combination with AAPA, does not teach or suggest a display device equipped on one side of a substrate, and a thin film integrated circuit equipped on the

other side of the substrate, where the display device is electrically connected to the thin film integrated circuit through a contact hole in the substrate.

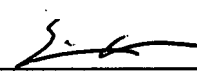
Also, the claims have been amended to recite that each of the display device and the thin film integrated circuit comprises a polycrystalline semiconductor film. The Official Action asserts that Freeman discloses that "a semiconductor element used for the thin film integrated circuit and the display device is formed by using a polycrystalline semiconductor film (14)" (page 3, Paper No. 20070507). That is, the Official Action appears to be asserting that the "transparent (or opaque or translucent) substrate 14 (PVC or other plastic)" (column 4, lines 17-18) corresponds with the polycrystalline semiconductor film of the present claims. The Applicant respectfully disagrees and traverses the assertions in the Official Action. Freeman and AAPA, either alone or in combination, do not teach or suggest that the transparent (or opaque or translucent) substrate 14 (PVC or other plastic) comprises a polycrystalline semiconductor film.

Since Freeman and AAPA do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New dependent claims 14-29 have been added to recite additional protection to which the Applicant is entitled. The features of claims 14-29 are supported in the present specification, for example, by Figures 1C, 2C and 8C; page 19, lines 4-5; page 21, lines 10-12; and page 27, lines 23-24. The Applicant respectfully submits that new claims 14-29 are in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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